

From: evan@cfwlegal.com
To: sfreeman@freemanlawfirm.org
Subject: RE: Discovery follow up
Date: Friday, October 29, 2021 11:11:00 AM

Hi Spencer –

Following up, there are no other written contracts regarding ad brokers (other than Tiger Media).

And, confirming, the modified answer does apply to all of the responses. Where we say there are no documents with US entities, it also extends to no (related) documents that reference the United States.

Evan

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From: sfreeman@freemanlawfirm.org <sfreeman@freemanlawfirm.org>
Sent: Friday, October 8, 2021 4:00 PM
To: evan@cfwlegal.com
Subject: Discovery follow up

Evan,

I wanted to follow up on our recent conference regarding discovery issues. From my notes, regarding FSG discovery requests you were going to check on whether there were any other written contracts regarding ad brokers (other than Tiger Media). Additionally, you were going to check on a more widespread issue for both FSG and Fung responses. A lot (if not most) of the responses stated that there were no such requested documents with U.S. entities. There were a few that said that there were no documents that referenced the United States. In talking with you, you commented that such modified applied to all responses – including all that stated there were no documents with U.S. entities but were going to double check.

Have you had a chance to follow up yet? Also, any movement on settlement discussions?

As we discussed, I will need to file a motion to continue the current deadline of 10/19, with anticipation of filing a discovery motion. If the motion to continue is an agreed motion, I can file it for hearing on same day of filing.

Regards,

Spencer

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